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December 19, 2023

BY ECF

Hon. Orelia E. Merchant  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Alexander Figliolia, Jr.  
23 Cr 498 (OEM)

Dear Judge Merchant:

I am the attorney for defendant Alexander Figliolia, Jr. Mr. Figliolia was arrested in connection with this matter on December 6, 2023, and charged in the Indictment with alleged income tax violations. He was released the same day on a \$2 million Appearance Bond secured by real property, with standard conditions of release, including pretrial supervision as directed, travel limitations and the surrender of his passport.

By this letter, I am respectfully requesting that Your Honor grant Mr. Figliolia permission to travel to the Bahamas with his wife, three young daughters, and sister-in-law, from January 1 to January 6, 2024. The trip was scheduled and pre-paid for well in advance of Mr. Figliolia's arrest. He will, of course, need his passport returned to him by Pretrial

Services prior to departing and will return it to them after he gets back.

Both the government and Pretrial Services have already been provided with the Figliolia's proposed travel itinerary for the trip. The government does not object and defers to the Court on this travel request and Pretrial Services also has no objection to this travel request.

Respectfully submitted,

/JRF/

James R. Froccaro, Jr.

JRF:pa

cc: USPSO Colton Craft, by email